

Rapaport Law Firm

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July 18, 2018

Hon. Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Mendez v. Jbird One LLC et al. (LGS)
Case No. 1:18-cv-01636

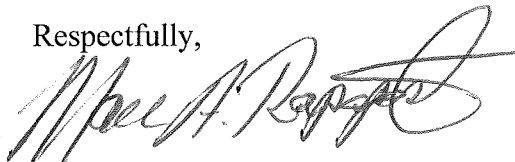
Dear Judge Schofield:

We represent Plaintiff, Willie Mendez, in the above-referenced action. We respectfully submit this status letter on behalf of all parties pursuant to Your Honor's Orders dated May 9 and July 17, 2018.

The parties have not engaged in formal discovery (and Defendants did not enter their appearances herein) because on May 11, 2018, all parties reached an agreement regarding the precise amount of the settlement payable to Plaintiff by Defendants. Negotiations regarding the non-monetary terms of the settlement agreement have been painstaking. To protect Plaintiff during this process, at Plaintiff's insistence, the full amount of the settlement is being held by Defendants' counsel, Robert Lorenc, Esq., in Mr. Lorenc's attorney escrow (IOLA) account.

The parties have exchanged several drafts of a settlement agreement. We have agreed upon all terms and language except for a single paragraph, which we believe will be resolved shortly. We hope to submit a fully executed settlement agreement, together with a *Cheeks* application for approval, no later than August 10, 2018.

Respectfully,



Marc A. Rapaport

cc: Robert C. Lorenc, Esq. (via email: robert@lorenclaw.com)